

EXHIBIT 7

Brand, Lee

From: Brand, Lee
Sent: Thursday, September 17, 2020 1:56 PM
To: 'Patti Syverson'
Cc: Brian Penny; Stu Davidson; Carrie Laliberte; Polidora, Roxane A.
Subject: RE: Starkist

Patti,

We are simply trying to structure discovery in the manner that is most efficient for the parties and the Court. That is why we continue to propose discussing what discovery, if any, Plaintiffs believe is necessary to respond to the pending motion to deny class certification and a briefing schedule that will accommodate agreed upon discovery. As noted in the motion, an extremely small percentage of your discovery requests are related to the issue of classwide exposure, so it is appropriate to focus on what, if any, discovery you believe you need on those subjects for your opposition brief.

As for your intention to move to compel, we remind you that Judge Orrick expects the parties to put significant effort into resolving these sorts of issues before burdening the Court with them. Specifically, while the "in person" meet and confer requirement of his standing order for civil cases is currently suspended due to coronavirus, paragraph 4 of the order still requires lead trial counsel for the parties to meet and confer to attempt to resolve discovery disputes and, if and only if a good faith effort to resolve the dispute is unsuccessful, to prepare a concise *joint* statement.

Roxane and I are generally available to meet and confer on Monday from 11 a.m. to 3 p.m. or Tuesday from 10:30 a.m. to noon and from 2 p.m. on regarding both the discovery Plaintiffs believe is necessary to respond to the motion and the discovery requests and responses more broadly. Please let us know what times work on those days. We sincerely hope that you will be prepared to discuss in good faith a reasonable and efficient approach to discovery in this matter.

Best,
Lee

From: Patti Syverson <psyverson@bffb.com>
Sent: Thursday, September 17, 2020 10:54 AM
To: Brand, Lee <lee.brand@pillsburylaw.com>
Cc: Brian Penny <penny@lawgsp.com>; Stu Davidson <sdauidson@rgrdlaw.com>; Carrie Laliberte <claliberte@BFFB.com>
Subject: RE: Starkist

Lee –

We were simply seeking the professional courtesy of a two week extension for our opposition to your motion to deny certification but it does not look like you are willing to provide that absent a broader discovery agreement. Therefore, we intend to respond to your motion according to the current schedule.

As for your discovery responses, we believe your wholesale objections to all our discovery requests are improper, contrary to the schedule the parties agreed to at the Initial Case Management Conference and violate the Court's scheduling order. There is no formal bifurcation in this litigation and your motion to deny certification does not operate as a stay. We are willing to meet and confer regarding your objections but intend to move to compel responses.

Patti

Patricia N. Syverson



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From: Brand, Lee [<mailto:lee.brand@pillsburylaw.com>]

Sent: Wednesday, September 16, 2020 12:01 PM

To: Patti Syverson <psyverson@bffb.com>

Subject: RE: Starkist

Hi Patti,

We are happy to consider an extension, but it would need to be part of a broader agreement about discovery vis-à-vis StarKist's motion to deny class certification. As set forth in the motion, we do not believe any discovery is necessary for Plaintiffs to respond. But as I wrote yesterday when I served our responses to your first set of discovery requests, we are willing to meet and confer on that subject.

If you believe discovery is necessary to respond, let's discuss the scope of that discovery and a briefing schedule that will allow it to happen. If you don't believe discovery is necessary to respond, we are fine with a two-week extension provided that StarKist also receives an additional two weeks on reply and all discovery is put on hold until the motion is resolved.

Best,
Lee

Lee Brand | Counsel

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Pronouns: he/him/his

From: Patti Syverson <psyverson@bffb.com>

Sent: Tuesday, September 15, 2020 1:22 PM

To: Brand, Lee <lee.brand@pillsburylaw.com>

Subject: Starkist

*** EXTERNAL EMAIL ***

Lee – In regard to Starkist’s Motion to Deny Class Certification, we would like to request a two-week extension for filing our opposition (it is currently due on 9/25). If that is agreeable, we can prepare a stipulation for your review.

Thanks,
Patti

Patricia N. Syverson



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